



EXHIBIT 30

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DREW J. RIBAR, Pro Se Plaintiff

3480 Pershing Ln

Washoe Valley, NV 89704

(775) 223-7899

Const2Audit@gmail.com

vs.

WASHOE COUNTY, et al.

Defendants.

Case No.: 3:24-cv-00526-ART-CLB

EXHIBIT 30

Title: *Video Recording of June 20, 2024, Reno Library Restriction Notice*

Date of Recording: June 20, 2024

Source: Plaintiff's Personal Recording

Bates Number Range: Video 4

DESCRIPTION

This exhibit is a video recording from **June 20, 2024**, at the Reno Library, documenting violations of **due process, selective enforcement, and government collusion** with Build Our Center (BOC) in restricting public access.

PLEADING TITLE - 1

KEY INCIDENTS CAPTURED IN VIDEO (WITH TIME STAMPS)

Evidence of Government-Private Collusion to Restrict Public Access

- **T/S 0:02:35** – *Build Our Center (BOC) Pavilion & signage set up at library entrance.*
 - Shows **BOC controlling access** to a **public library**, reinforcing **state actor liability** under *Lugar v. Edmondson Oil Co.*, 457 U.S. 922 (1982).
 - Demonstrates **Washoe County's delegation of law enforcement-style authority to a private entity.**

Due Process Violations – Unlawful 365-Day Library Suspensions Without Justification

- **T/S 0:12:36** – *Washoe County Library employee Kristen Ryan informs Plaintiff of a 365-day suspension.*
 - **No prior notice, hearing, or due process** before suspension.
 - False claim that Plaintiff injured a librarian, **without supporting evidence.**
 - Violation of **Fourteenth Amendment Due Process Clause** (*Mathews v. Eldridge*, 424 U.S. 319 (1976)).
- **T/S 0:33:35** – *Kristen Ryan informs Mr. Fred Myer that he is also suspended for 365 days.*
 - **No specific behavior cited, no appeal process available.**
 - Demonstrates **selective enforcement and retaliation** against individuals critical of library policies.

1 **Library Director's Physical Contact with Plaintiff Confirmed**

- 2
- 3 • **T/S 0:52:27** – *Library Board Trustee Ann Silver admits watching video evidence of*
- 4 *Library Director Jeff Scott making physical contact with Plaintiff.*

- 5 ○ Silver states:

6

7 *"I watched the videos. I don't want anyone touching anybody."*

- 8
- 9 ○ **Supports Plaintiff's assault claim** against Jeff Scott under *NRS 200.481*.
- 10 ○ **Bolsters First Amendment Retaliation Claim**, as physical contact was an act of
- 11 **intimidation for Plaintiff's protected speech.**
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- 13

14

15 **RELEVANCE TO CASE & LEGAL CLAIMS**

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17 **1. First Amendment Retaliation & Viewpoint Discrimination**

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- 19 • **Washoe County enforced suspensions selectively** based on political viewpoints.
- 20 • Plaintiff was **banned from a public library without cause**, violating *Kreimer v. Bureau*
- 21 *of Police, 958 F.2d 1242 (3d Cir. 1992).*
- 22

23 **2. Fourteenth Amendment – Due Process Violation**

- 24
- 25 • **Suspensions imposed without notice or hearing.**
- 26 • Violation of *Armstrong v. D.C. Pub. Library, 154 F. Supp. 2d 67 (D.D.C. 2001).*
- 27

28 **3. Monell Liability – Systematic First & Fourteenth Amendment Violations**

- **Washoe County has a policy and custom of unlawful bans** and viewpoint discrimination (*Monell v. Dep't of Soc. Servs.*, 436 U.S. 658 (1978)).
- **The pattern of due process violations & suppression of speech** justifies punitive damages.

4. Refutes BOC's Motion to Dismiss – Establishes State Actor Nexus

- **BOC exercised authority over a public library**, making them **state actors** under *Lugar v. Edmondson Oil Co.*.
- Washoe County **permitted BOC members to enforce access control**, making them liable under 42 U.S.C. § 1983.

5. Supports Assault & Battery Claim Against Library Director Jeff Scott

- **Ann Silver's statement confirms physical contact**, corroborating Plaintiff's claim.
- Physical interference violates **NRS 200.481 (battery law in Nevada)**.

CERTIFICATION & SUBMISSION

I certify that this exhibit is a true and accurate representation of events recorded on June 20, 2024.

Dated: **March 17, 2025**

/s/ **Drew J. Ribar**
Drew J. Ribar, Pro Se Plaintiff
3480 Pershing Ln

PLEADING TITLE - 4

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PLEADING TITLE - 5